



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 29, 2020

**BY ECF**

The Honorable Laura Taylor Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Mircea Constantinescu, et al.*, 19 Cr. 651 (LTS)**

Dear Judge Swain:

The Government respectfully submits this letter to request, with the consent of the defendants, that, in light of the advice given by the Centers for Disease Control and Prevention and other public health authorities to take precautions to reduce the possibility of exposure to COVID-19, and in order to provide the defendants with additional time to review the discovery materials produced in this case and discuss potential pretrial dispositions with the Government, the Court adjourn the status conference presently scheduled for June 8, 2020, at 2:00 p.m., to a date and time convenient to the Court on or after July 6, 2020.

The Government also respectfully requests, with the consent of the defendants, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from June 8, 2020, until the date of the rescheduled status conference, in light of the circumstances of the COVID-19 pandemic, and in order to provide the defendants with additional time to review the discovery materials produced in this case and discuss potential pretrial dispositions with the Government.

Respectfully submitted,

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cc: All Counsel of Record (by ECF)